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CADDO PARISH COMMUNICATIONS DISTRICT NUMBER ONE

1144 TEXAS AVENUE
SHREVEPORT, LOUISIANA 71101

MARTHA CARTER, 9-1-1 ADMINISTRATOR
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January 6, 1995

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Office of the Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Reference: CC Docket No. 94-102

Gentlemen:

Enclosed are the original and nine copies of comments of Caddo Parish Communications District Number One in the Commission's Notice of Proposed Rule Making in CC Docket No. 94-102.

Sincerely,

Martha Carter

Martha Carter, 9-1-1 Administrator

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JAN 9 1995

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In the Matter of)
)
Revision of the Commission's rules) CC Docket No. 94-102
to ensure compatibility with)
enhanced 9-1-1 emergency calling systems) RM-8143

To the Commission ~~DOCKET FILE COPY DUPLICATE~~ ~~DOCKET FILE COPY DUPLICATE~~

COMMENTS OF CADDO PARISH COMMUNICATIONS DISTRICT NUMBER ONE
TO NOTICE OF PROPOSED RULE MAKING

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The District

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1. Caddo Parish (Louisiana) Communications District Number One is an establishment created jointly by the Parish and the City of Shreveport to implement a Parish-wide Enhanced 9-1-1 System with a co-located modern dispatch center for law enforcement, fire protection and emergency medical services.

2. The District continuously evaluates its operations and methods by which the overall delivery of Public Safety services to the citizens of the Parish via the Enhanced 9-1-1 System may be improved. It is currently studying alternatives for improved Computer Aided Dispatch, Records Management, Mobile Data Terminal and Automatic Vehicle Location Systems, as well as the replacement of the Public Safety Radio systems with a new, state of the art 800 MegaHertz trunked radio system.

3. Officials and personnel of the District are members of the Association of Public-Safety Communications Officials International, Inc. (APCO) and the National Emergency Number Association (NENA), and supports the efforts of these

organizations to provide the Commission comprehensive responses to the questions posed in this NPRM.¹ The District intends to submit Reply Comments in this proceeding with respect to specific comments in this proceeding by these organizations or others with which it may not fully agree.

Summary Position

4. The District's position is that its responsibility is to provide E 9-1-1 emergency telephone number/public safety communications service to the citizens of Caddo Parish who can access such service. It is beyond the District's responsibility to see to it that every citizen has one or more telephones or other suitable communications device(s) that can access the service. The service has been developed with the concept that the District assist in getting the appropriate emergency assistance to the location of the calling party as quickly as possible. The District can provide its service only when the public, or any segment of the public, is capable of quickly accessing it and, as is the case with respect to any service, of supporting it. The Commission is proposing in this proceeding to foster the expansion of the E 9-1-1 concept to users of the switched telephone network, particularly customers of wireless communications carriers, who have not heretofore been equipped to access the E 9-1-1 service in the ways it has been designed to be

¹ The National Association of State Nine-One-One Administrations (NASNA) is also participating in this effort as representative of the views of the government public safety interests who are responsible for the implementation and operation of 9-1-1 services. The views of parties interested in providing PBX and wireless communications equipment and commercial customer services are being offered by others.

accessed. The District commends the Commission for its objectives in Docket 94-102 and looks forward to providing E 9-1-1 service to the many new users of the service contemplated by the Commission, when they are able to access the service and help support it; i.e., when their "compatibility with E 9-1-1 emergency calling systems" is "ensured" as an outcome of this rulemaking.²

Objective of the Proceeding

5. The Commission has identified the primary objective of this proceeding as being to ensure broad availability of 9-1-1 and enhanced 9-1-1 services to users of the public switched telephone network (PSTN) whose health and safety may depend on 9-1-1 emergency services systems, while ensuring that the effective operation of 9-1-1 services is not compromised by new developments in telecommunications.³

6. The District commends the Commission for its recognition of the value

² One of the key documents under consideration in this rulemaking is a "Joint Experts Meeting Report" entitled "Wireless Support of 9-1-1 and Enhanced 9-1-1 Emergency Services", dated November 2, 1994. The matters addressed in this Report go more to the question of how "compatible" E 9-1-1 service can be provided to the customers of wireless communications services than to the question of how wireless techniques can improve E 9-1-1 service as it has been developed. Caddo Parish Communications District Number One believes that the principal role of the 9-1-1 community in Docket 94-102 should be to identify its requirements for extending its services to the wireline customers of the carriers and leave the questions of how these requirements can be met to the carriers and their wireless equipment providers. These requirements will vary from State to State and from PSAP to PSAP. The 9-1-1 services should not be held out as being available to the wireless customers in a given area until the 9-1-1 community's requirements in that area can be met.

³ NPRM in CC Docket No. 94-102, released October 19, 1994, Paragraph 1.

of 9-1-1 services to the American society. Also commendable is the Commission's sensitivity to the impact of developing technology on the existing emergency telephone number operations.

7. It would be difficult to frame an objective more consistent with the purpose for which the Commission was created: to regulate interstate and foreign commerce in communication by wire and radio to make available, so far as possible, to all the people of the United States a rapid, efficient, Nation-wide, and world-wide wire and radio communication service with adequate facilities at reasonable charges, for the purpose of the national defense (and) for the purpose of promoting safety of life and property through the use of wire and radio communications.⁴

8. It is particularly encouraging that the Commission is addressing the impact of the developing PCS technology on existing 9-1-1 operations before the construction and wide-spread use of this new version of wireless communication systems. This will enable the entrepreneurs who will be operating the PCS systems, and their equipment suppliers, to avoid some of the problems that have been encountered as a result of PBX, cellular and other carrier wireless services providers developing their systems with little attention being paid by them to 9-1-1 interfacing complexities or operating problems prior to such services being offered to the public.

9. Caddo Parish fully agrees with the intent of Docket 94-102 that the

⁴ Title I, Section 1 (47 U.S.C. 151), Communications Act of 1934, As Amended, and NPRM, Paragraph 7.

customers of these new services should be able to access E 9-1-1 services as easily and efficiently as can the customers of present services which have gone through the developmental steps to make E 9-1-1 emergency service accessible to their customers. In communities where fully functioning E 9-1-1 systems are in place, after many years of development and great financial outlays, the new services should be required to provide the existing 9-1-1 operations with sufficient data to permit a 9-1-1 Public Safety Answering Point (PSAP) to treat a customer of one of the new services as quickly and efficiently as they do the customers of "traditional" telephone services.

10. The District agrees with the requirements identified in the Notice which will have to be met for such a status to be reached. These requirements will further mature as Docket 94-102 progresses. The PBX and wireless service providers should then have the responsibility to meet those requirements, in cooperation with the local government public safety agencies which provide the 9-1-1 emergency number service itself. The 9-1-1 centers will have the responsibility for handling the greatly increased volume of emergency assistance calls, through the employment and training of additional personnel and the use of more complex call-handling and record-keeping systems as the service to these additional callers grows.

11. The numbers of wireless phones expected by the Commission to be in service by the year 1998, weighed against the percentage of wireless 9-1-1 callers who cannot identify their locations⁵, promise an extreme challenge to the 9-1-1 centers if they are to provide quality 9-1-1 service to these new people. One greatly

⁵ NPRM, Paragraph 19.

complicating factor will be that a large percentage of the users of these new services will be away from their homes when they dial 9-1-1, and they will not be familiar with the areas from which they will be calling. Both the Docket 94-102 Notice and additional sources cite examples of the difficulties which will be confronted. New, additional examples are surfacing steadily. ⁶

12. While Caddo Parish supports the development of national standards, developing national 9-1-1 accessibility standards will be difficult, since national 9-1-1 operational standards do not exist.⁷ In the absence of assigned or dedicated Federal government interest or responsibility when 9-1-1 development began in the United States, there were no provisions for the mandating of uniformity in the delivery of services. As a result, 9-1-1 legislation, where it exists, varies from State to State.

13. The NPRM requests comment on potential conflicts between the proposed rules and existing state legislation. The States of Mississippi and Washington have specific legislation addressing PBX's, with Washington adopting legislation on the delivery of Automatic Number Information (ANI) to PSAPs. Every

⁶ The Daytona Beach NEWS-JOURNAL of December 28, 1994 reported that Coordinators of 9-1-1 systems in 40 counties in the State of Florida, voting in October 1994 to ask the State Legislature to approve a 50-cent per month surcharge on cellular telephone users to fund a statewide 9-1-1 emergency response system, estimated that as many as 17 percent of one county's 9-1-1 calls are already coming from cellular subscribers. One estimate is that there are currently 1,400,00 cellular phones being used in Florida, where three counties have no 9-1-1 service at all; another 14 counties have less-than-fully enhanced 9-1-1 service.

⁷ This was highlighted during ABC's broadcast of National News on December 21, 1994, in a program centered on the lack of uniformity in 9-1-1 services around the United States.

State's cellular and PBX statutes, where they exist, will have to be reviewed to address the Commission's request. Coordination between the Commission and each State's communications regulatory agency is critical, to insure that Commission action is not inconsistent with State or local requirements.

14. The District agrees with the order of importance of 9-1-1 call features as itemized in Appendix B of the Notice, as well as the information elements required of new technology to be provided to the PSAP as listed in Appendix D of the Joint Position Paper. It is concerned with the reliability and accuracy level of the information provided to the PSAP and whether a minimum standard of accuracy can be developed.

15. The District is concerned that the Commission may be attempting to do too much in a single proceeding involving new PBX, cellular, PCS and possibly other wireless technologies, data requirements, operational realities, and financial considerations as well as the grandfathering of equipment, particularly PBXs which may not be required to comply with the minimum standards for information delivery.

16. The proposed idea of simply labeling non-compliant equipment and permitting the continued sale of equipment which does not conform to new 9-1-1 accessibility/Automatic Location Information (ALI) standards does not address liability issues. An implied liability exposure exists when 9-1-1 service is publicized in a community since a 9-1-1 caller who can access the service has a right to expect the same quality and speed of service that have become the norm with respect to service from "traditional" telephones. The District suggests that a better approach would be to have vendors develop equipment or interfaces that will allow old equipment to be

retrofitted with new technology to allow the delivery of ALI if standards are to be mandated for new PBXs.

17. Indeed, while Docket 94-102 deals largely with 9-1-1 operating requirements and PBX and wireless technology, the Commission could advance its stated objective of the proceeding by addressing directly the liability issue and providing national standards under which 9-1-1 centers and personnel could be judged immune from liability. The District does not advocate rubber-stamp immunity from liability for either 9-1-1 centers or personnel. It does recommend that the Commission foster equipment, procedures and training standards which, if met in the case of a disputed incident, could serve as a defense against liability. If the Commission does not believe it presently has the authority to take such action in this proceeding, the District recommends that it seek such authority by Congressional amendment of the Communications Act.

18. Caddo Parish is in the process of working toward a capability, new in this area of the country, at least, that would be of great benefit to both 9-1-1 centers and cellular carriers, and suggests that the Commission may want to lend its support, since it is consistent with the objectives of the 94-102 rulemaking. The concept calls for the delivery of Automatic Number Identification on cellular 9-1-1 calls, with ringback. The District anticipates that this would be a tremendous step forward at relatively low cost. The cellular switch would be seen as another end office tied to the 9-1-1 tandem. Centralized Automated Message Accounting (CAMA) Trunks would be engineered from the cellular switch to the 9-1-1 network, which

would send ANI to the PSAP. The only cost to the District would be the monthly recurring costs of two more trunks. The cellular companies serving the District's area would be providing access to the switch "free of charge" because they have the space in their switch, and they are sensitive to the needs of public safety. This is a prime example where cost sometimes is not a consideration. The willingness on the part of the vendors becomes the real issue.

Conclusion

19. The District appreciates the opportunity to present its initial views in this proceeding, and urges the Commission to act consistent with these views as it completes this rulemaking.

Respectfully submitted,

A handwritten signature in cursive script that reads "Martha Carter".

Martha Carter, 9-1-1 Administrator
Caddo Parish Communications District Number One
1144 Texas Avenue
Shreveport, Louisiana 71101

January 9, 1995

Phone (318) 226-6282